



October 27, 2021

Alaska Broadband Task Force
c/o Governor's Office
550 West 7th Avenue, Suite 1700
Anchorage, AK 99501

Dear Alaska Broadband Task Force Members,

Over the last couple months, the Task Force has explored broadband technology and policy issues affecting broadband expansion in Alaska. Although the federal government spends almost \$400M annually on telecom and broadband subsidies in Alaska, approximately 10% of those funds go to actual broadband expansion – 90% goes to user subsidies.

Still 36.3% of rural Alaskans (~95,000) have no wired broadband service, according to the FCC's [Fourteenth Broadband Deployment Report](#) (page 57). In fact, many places in Alaska just don't have the economic base to support broadband expansion into their community, either due to limited incomes or the very cost of fiber/microwave middle mile deployment. Expansion using terrestrial options to 90+ communities just doesn't "pencil out".

Satellite will play a critical role in deploying broadband to these "abandoned" communities. This is already happening with the very first being the Akiak Native Community using 2.5 GHz Tribal spectrum, a wireless WISP last mile system and satellite middle mile for backhaul. They've literally launched their own broadband network and that should be acknowledged.

Although we truly appreciate the efforts of the AKBTF, we also believe the Task Force has not yet accomplished what Governor Dunleavy requested. Besides our two previous emails and the MS Word document revisions offered separately, this is an additional list of omissions and errors that should be corrected:

1. The Aurora Network GEO HTS satellites will have the ability to reach 950 Mbps (almost 1 Gig) speeds to a single location. Latency will exceed 100ms – that is our only challenge. 90+% of Internet traffic today is insensitive to latency and will not notice it even while streaming music/TV or conducting two-way video conferencing. Don't let latency be the reason unserved Alaskans don't get broadband.
2. It was mentioned latency would eliminate our GEO HTS satellites – this is untrue. By statute, the Assistant Secretary of Commerce can bypass the NTIA latency rule and utilize what he/she deems necessary to get broadband to a particular rural area. This Congressional direction was included specifically for rural Alaska.
3. ARPA allocated \$1B to the NTIA Tribal Broadband Connectivity Program for America's tribes to deploy their own broadband networks. Alaska tribes expect about 50% of that funding to come to arrive within the next 12 months. There is no information summarizing this NTIA program in the report.

4. There was no mention of the Aurora Network satellite middle mile project providing connectivity to 100% of Alaska approximately Q2 2022 or OneWeb LEO service starting commercial service in November 2021.
5. Christine O'Connor, Executive Director of the Alaska Telecom Association (ATA), served as the Chair of the technical subcommittee – this should be mentioned in the report. She also served often as the meeting facilitator and played a major role in editing the report. This may help explain why the report is very pro-fiber and very anti-satellite, as most of her suggestions were accepted without contest.
6. The ATA wrote the FCC USF Alaska Plan, which is how Alaska receives approximately \$150M in broadband and telecom funding annually. It lowers the standard definition of broadband to 10X1 (for Alaska) and at year 5 of 10, Alaska Plan members have not yet met some of the benchmarks it set. It also excludes any new firms entering the market from accessing these funds, making it very protectionist and anti-competitive in nature. There is no information within the report summarizing the Alaska Plan, its set benchmarks, or its effectiveness in expanding broadband.
7. Determining the “gaps” in broadband connectivity takes more than a list of communities and number of households which have nothing. Having the ATA literally sitting at the table provides an opportunity for the AKBBTF to ask the telecoms themselves for that connectivity data. That has not happened, and they surely have not offered it.
8. The AKBBTF recommended three branches when it comes to opening a new Alaska Broadband Office, which seems overly bureaucratic. We believe this can be done with minimal staff (office director, network engineer and economist) and co-locate inside the SOA Department of Commerce, DCRA.
9. Alaska's largest provider is advertising “2 Gig” speeds in Anchorage currently. It must be pointed out that as urban areas are consistently enjoying faster speeds, those still without a broadband connection (25X3 or faster) are being left farther and farther behind. Alaska's unserved MUST be made a priority and fiber cannot continue to be the only answer. The report must be completely TECHNOLOGY NEUTRAL.
10. Economic criteria must be recommended to make sensible spending decisions. These include time to market, breadth of coverage, cost to the customer, and sustainability without further subsidies. Using these standards will yield the best use of public funds.

Thank you for your dedication and the time you've spent volunteering on the Task Force. We appreciate your hard work and many hours of research.

Sincerely,

/s/ Shawn Williams

Shawn Williams
Vice President of Government Affairs & Strategy